

Internal Revenue Service

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Department of the Treasury

Washington, DC 20224

Contact Person: [REDACTED]

Telephone Number: [REDACTED]

In Reference to:

CP:E:EO:T:1

Date:

SEP 3 0 1997

[REDACTED]
Employer Identification Number: [REDACTED]

Key District: [REDACTED]

Form: [REDACTED]

Tax Years: [REDACTED]

Dear Applicant:

This letter constitutes a final adverse ruling with respect to your claim of exemption from federal income taxation under section 501(c)(4) of the Internal Revenue Code.

We make our ruling for the following reason(s):

You are acting as a broker in a regular commercial manner to obtain health care insurance for your members. Therefore, you are furthering your members' and the health insurers' private commercial interests. Consequently, your activities serve the private interests of these groups rather than serving the community as a whole as required under section 1.501(c)(4)-1(a)(2) of the Income Tax Regulations. In addition, you are engaging in a business activity of the type and in a manner similar to one ordinarily carried on for profit in contravention to section 1.501(c)(4)-1(a)(1) of the regulations which requires that an organization described in section 501(c)(4) of the Code not be organized or operated for profit.

The Code and the regulations issued thereunder require that you file federal income tax returns. Based upon the financial information that you furnished, you should file returns on the form and for the tax years indicated above within 30 days from the date of this letter with your key District Director for exempt organization matters, shown above, unless you request and your key District Director grants an extension of time to file the returns. You should file returns for later tax years with the appropriate service center indicated in the instructions for those returns.

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[REDACTED]

If you have any questions concerning the reasons for this ruling, please contact the person whose name and telephone number appear in the heading of this letter. You should address questions concerning the filing of returns to your key District Director.

Sincerely,
(signed) Marvin Friedlander

Marvin Friedlander
Chief, Exempt Organizations
Technical Branch 1

CP:E:EO:T:1 CP:A:EO:T:1
[REDACTED] [REDACTED]